

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
SOUTHERN DIVISION

In re: ) Chapter 11  
 )  
 ) Case No. 05-44481(RDD)  
 ) Jointly Administered  
DELPHI CORPORATION, et al., )  
 )

Debtors.

**VERIFIED STATEMENT UNDER  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Bodman LLP as counsel to Comerica Bank (“Comerica”), Lear Corporation (“Lear”), Pentastar Aviation, LLC (“Pentastar”), American Axle & Manufacturing, Inc. (“American Axle”), Freudenberg-NOK, General Partnership and its subsidiaries, Freudenberg-NOK, Inc., Flexitech, Inc., and Vibracoustic de Mexico, S.A. de C.V. (collectively “Freudenberg”), Freudenberg Nonwovens Limited Partnership (“Nonwovens”), Hayes Lemmerz International, Inc. and its subsidiaries, Hayes Lemmerz International – Frenos S.A. de C.V., Hayes Lemmerz International – Homer Inc., and Hayes Lemmerz International – Wabash, Inc. (collectively “Hayes Lemmerz”), KenSa, LLC (“KenSa”), Vibracoustic GmbH & Co. KG (“Vibracoustic”) and Cooper-Standard Automotive Inc. (“Cooper-Standard”) submits this Verified Statement under Fed. R. Bankr. P. 2019 and states as follows:

1. Comerica is located at One Detroit Center, 500 Woodward Avenue, Detroit, Michigan 48226. Prepetition, Comerica was part of the lending group to Debtor. Bodman has represented Comerica’s interest as a depository bank for one or more of Debtors. Bodman has acted as one of Comerica’s outside counsel for many years.

2. Lear is located at 21557 Telegraph Road, Southfield, Michigan 48034. Lear is a customer of one or more of Debtors. Prepetition, Lear purchased parts from and sold parts to one or more of Debtors and, postpetition, purchases parts from and sells parts to one or more of Debtors. Lear may also have claims against one or more of Debtors. Bodman has acted as one of Lear's outside counsel for many years.

3. Pentastar is located at 7310 Highland Road, Waterford, Michigan 48327. Pentastar has a prepetition claim in an undetermined amount against one or more of Debtors based on charter flights and other goods or services, or both, provided to Debtors by Pentastar. Bodman has acted as one of Pentastar's outside counsel for several years.

4. American Axle is located at One Dauch Drive, Detroit, Michigan 48211. Prepetition, American Axle purchased parts from and sells parts to one or more of Debtors and, postpetition, purchases parts from and sells parts to one or more of Debtors. American Axle may also have claims against one or more of Debtors. Bodman has acted as one of American Axle's outside counsel for many years.

5. Freudenberg is located at 47690 East Anchor Court, Plymouth, Michigan 48170. Freudenberg has a prepetition claim in an undetermined amount against one or more of the Debtors. Bodman has acted as counsel for Freudenberg on this matter and other matters.

6. Nonwovens is located at 3500 Industrial Drive, Durham, North Carolina 27704. Nonwovens has a prepetition claim in an undetermined amount against one or more of the Debtors. Bodman has acted as counsel for Nonwovens on this matter and other matters.

7. Hayes Lemmerz is located at 15300 Centennial Drive, Northville, Michigan 48167. Hayes Lemmerz has a prepetition claim in an undetermined amount against one or more of the Debtors. Bodman has acted as counsel for Hayes Lemmerz on this matter and other matters.

8. KenSa is located at 36199 Mound Road, Sterling Heights, Michigan 48310. Prepetition, KenSa purchased parts from and sells parts to one or more of Debtors and, postpetition, purchases parts from and sells parts to one or more of Debtors. KenSa may also have claims against one or more of Debtors. Bodman has acted as counsel for KenSa in this and other matters.

9. Vibracoustic is located at Hohnerweg 2-4, D69465 Weinheim, Germany. Vibracoustic has a prepetition claim in an undetermined amount against one or more of the debtors. Bodman has acted as counsel for Vibracoustic in this matter only.

10. Cooper-Standard is located at 39550 Orchard Hill Place Drive, Novi, Michigan 48375. Cooper-Standard has a prepetition claim in an undetermined amount against one or more of the Debtors. Bodman has acted as Cooper-Standard's outside counsel in this matter and in other matters.

11. There are no instruments or written agreements under which the undersigned counsel, or Bodman in general, is empowered to act for Comerica, Lear, Pentastar, American Axle, Freudenberg, Nonwovens, Hayes Lemmerz, KenSa, Vibracoustic, or Cooper-Standard.

12. Upon information and belief, Bodman does not hold any claim against or interest  
in Debtors.

BODMAN LLP

By: /s/ Ralph E. McDowell  
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October 26, 2005